

## REPORTS ANALYSIS REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: November 16, 2009

ANALYST: Kristin DeCarmin

I. COMMITTEE: New York Republican Federal Campaign  
Committee  
C00055582  
Jane Corwin, Treasurer (10/5/09 – present)  
Joseph Savino, Treasurer (7/23/09 – 10/4/09)  
Michael Avella, Treasurer (3/30/99 – 7/22/09)  
315 State Street  
Albany, NY 12210

TYPE OF COMMITTEE: Party

II. REGISTRATION: August 2, 1976

III. BACKGROUND:

The Committee was sent sixteen (16) Requests for Additional Information (RFAs) which included reporting errors involving mathematical discrepancies, failure to provide supporting schedules, failure to properly itemize contributions from individuals, failure to properly itemize disbursements, Federal Election Activity/Levin funds and allocated federal and non-federal activity.

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New York Republican Federal Campaign Committee  
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<b>VIOLATION DESCRIPTION</b>	<b>REPORT(S)</b>	<b>DETAILS OF VIOLATION</b>
Mathematical Discrepancies	2008 M10	The Committee's report contained mathematical discrepancies totaling \$326,281.84.
Mathematical Discrepancies	Amended 2008 M10, received 12/8/08	Schedule A of the Committee's report disclosed memo entries totaling \$11,465.20 that did not appear to correspond to any itemized transaction(s).
Failure to Provide Supporting Schedules	Amended 2008 M10, received 12/8/08	The Committee's report disclosed additional receipts totaling \$16,105.09 for the reporting period.
Failure to Properly Itemize Contributions from Individuals	2007 M7	The Committee failed to provide adequate identification for 10 of 39 contributions from individuals that required itemization.
Failure to Properly Itemize Disbursements	2008 30G	The Committee disclosed a \$50,000.00 transfer from a national party committee on Schedule A supporting Line 12 of the Detailed Summary Page. The Committee also disclosed payments for exempt activities on Schedule B supporting Line 21(b) totaling \$10,124.54. The transferred funds may or may not have been for the payment of exempt activities.
Federal Election Activity/Levin Funds	2008 M10	On Schedule B, the Committee disclosed \$7,627.07 in disbursements made for "postage production for direct," but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed Federal candidates or if they expressly advocated the election or defeat of clearly identified Federal candidates.
Federal Election Activity/Levin Funds	2008 30G	On Schedule B, the Committee disclosed \$87,893.34 in disbursements made for "FEA mailers" and "FEA mailings," but failed to clarify whether these disbursements were FEA public communications that promoted, supported, attacked or opposed Federal candidates or if they expressly advocated the election or defeat of clearly identified Federal candidates.
Allocated Federal and Non-Federal Activity	2008 M10	The Committee disclosed disbursements for salary, wages and/or fringe benefits on Schedule H4, resulting in an apparent impermissible transfer-in from the non-federal account of \$14,802.37.
Allocated Federal and Non-Federal Activity	2008 30G	<p>The Committee disclosed disbursements for salary, wages, consulting, and/or fringe benefits on Schedule H4, resulting in an apparent impermissible transfer-in from the non-federal account of \$17,630.22.</p> <p>Schedule H4 disclosed \$11,639.00 in payments to a credit card company, but failed to provide any corresponding MEMO entries disclosing the name and address of the original vendors.</p>

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Allocated Federal and Non-Federal Activity	Amended 2008 30G, received 3/16/09	Schedule H4 disclosed an event year-to-date total for Administrative expenses of \$259,632.94; however, according to FEC calculations, this total should be \$283,132.82, resulting in a discrepancy of \$23,499.88.
Allocated Federal and Non-Federal Activity	2008 YE	The Committee failed to provide a Schedule H2 to disclose the allocation ratio and unique identifier code for a fundraising expenditure listed on Schedule H4.
Allocated Federal and Non-Federal Activity	Amended 2008 YE, received 3/17/09	Schedule H4 disclosed an event year-to-date total for Administrative expenses of \$281,961.81; however, FEC calculations disclose this total to be \$357,863.77, resulting in a discrepancy of \$75,901.96.

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